

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JUAN MORGAN,	)	
Plaintiff,	)	
	)	
v.	)	Civ. No.: 05-989(RCL)
	)	ECF
MIKE JOHANNNS,	)	
Secretary, Dept. of Agriculture,	)	
	)	
Defendant.	)	
_____	)	

**CONSENT MOTION TO ENLARGE DISCOVERY PERIOD**

Pursuant to Federal Rule of Civil Procedure 30(b), Defendant Mike Johanns, Secretary of the Department of Agriculture, respectfully requests a 30-day enlargement of the discovery period for the limited purpose of conducting depositions. Discovery currently is scheduled to end September 15, 2007. Pursuant to Local Civil Rule 7(m), counsel for Defendant contacted pro se plaintiff concerning this enlargement motion. Plaintiff consented, and indicated that an enlargement would further the interests of both parties.

This is a discrimination case arising out of Plaintiff's employment with the United States Department of Agriculture ("USDA") in Panama. Plaintiff wishes to depose two current USDA employees and four individuals who were USDA employees at the time of the events at issue in this litigation. The USDA employees that Plaintiff wishes to depose have extensive foreign travel obligations in connection with their jobs, and were unavailable on the September deposition dates proposed by Plaintiff or any other dates before the close of the discovery period. Although those individuals will be out of the country for the next six weeks, they will be available to be deposed by telephone on several dates in October. Plaintiff has requested that his deposition be re-scheduled for the same week as the USDA employees' depositions.

Accordingly, the parties are in the process of selecting new dates for depositions. Enlarging the discovery period for the limited purpose of conducting depositions will allow the parties to depose the individuals on dates on which counsel for Defendant, Plaintiff, and any local counsel that Plaintiff may retain,<sup>1</sup> are available.

Granting this limited enlargement of the discovery period should cause no prejudice.

For the foregoing reasons, the parties respectfully request that the Court GRANT this motion, and permit depositions to be conducted through October 15, 2007.

Dated: September 14, 2007

Respectfully submitted,

/s/  
JEFFREY A. TAYLOR, D.C. BAR # 498610  
United States Attorney

/s/  
RUDOLPH CONTRERAS, D.C. BAR #434122  
Assistant United States Attorney

/s/ Robin M. Meriweather  
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*Counsel for Defendant*

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<sup>1</sup> In a prior submission to this Court, Plaintiff indicated that he had discussions with a law clinic at Howard University School of Law concerning their representation of him. Plaintiff has been proceeding pro se because the attorney that represented him at the agency level is not admitted to practice in Washington, D.C.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of September, 2007, I caused a copy of the foregoing to be served upon *pro se* plaintiff and his counsel by electronic mail and first class mail, postage prepaid, addressed as follows:

Juan Morgan  
Pro se Plaintiff  
PSC 2, Box 2814  
APO AA 34002

John F. McHugh, Esq.  
6 Water Street  
New York City, NY 10004

/s/ Robin M. Meriweather

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Robin M. Meriweather, D.C. Bar # 490114

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Secretary, Dept. of Agriculture,	)	
	)	
Defendant.	)	
_____	)	

Upon consideration of Defendant's Motion to Enlarge Discovery Period it is, this  
\_\_\_\_\_ day of \_\_\_\_\_, 2007,

ORDERED that Defendant's Motion to Enlarge Discovery Period be, and hereby is,  
GRANTED;

it is further ORDERED that the fact discovery shall be extended for the limited purpose  
of completing depositions, and that depositions shall be completed by October 15, 2007.

SO ORDERED.

\_\_\_\_\_  
United States District Judge